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7 Attorney for Plaintiff THOMAS PARRISH

8 UNITED STATES DISTRICT COURT  
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10 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

11 THOMAS PARRISH, 12 13 Plaintiff, 14 15 v. 16 17 COUNTY OF SANTA CRUZ; OFFICER 18 GHANOW; CALIFORNIA FORENSIC 19 MEDICAL GROUP AND 20 UNKNOWN 20 AGENTS/EMPLOYEES OF THE COUNTY 21 OF SANTA CRUZ and THE CALIFORNIA 22 FORENSIC MEDICAL GROUP, 23 24 Defendants.	25 Case No. 18-cv-04484-HSG 26 27 AMENDED STIPULATION AND 28 <del>PROPOSED</del> ORDER TO AMEND 29 SCHEDULING ORDER
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30 Plaintiff THOMAS PARRISH (“Plaintiff”) and Defendants COUNTY OF SANTA CRUZ,  
31 OFFICER DAVID GANSCHOW (erroneously sued as “Officer Ghanow”) (“County Defendants”),  
32 and Defendant THE CALIFORNIA FORENSIC MEDICAL GROUP (“CFMG”) submit the  
33 following stipulation and proposed order continuing the dates in the scheduling order.

34 WHEREAS, on July 24, 2018, Plaintiff filed a complaint, on August 22, 2018, Plaintiff filed a  
35 first amended complaint, and on October 3, 2018, Plaintiff filed a second amended complaint  
36 (“SAC”).

WHEREAS, Defendant CFMG filed an answer to Plaintiff's SAC on October 10, 2018, Defendant County of Santa filed an answer to Plaintiff's SAC on October 22, 2018, and Defendant Ganschow filed an answer to Plaintiff's SAC on December 19, 2018.

WHEREAS, on October 31, 2018, County Defendants served Plaintiff with an initial set of discovery, and subsequently granted Plaintiff an extension to respond.

WHEREAS, in November and December 2018, Plaintiff's counsel, Kathleen Wells, experienced serious medical issues which impeded her ability to respond to the County Defendants' discovery or to litigate this matter;

WHEREAS, the settlement conference in this matter, formerly set for February 20, 2019, has been reset by order of Magistrate Beeler to June 4, 2019,

**Therefore**, Plaintiff, County Defendants, and Defendant CFMG stipulate and respectfully request as follows:

That the dates in the scheduling order be continued as follows:

<b><u>Event</u></b>	<b><u>Present Date</u></b>	<b><u>Requested Date</u></b>
Close of Fact Discovery	3/29/19	6/28/19
Exchange Opening Expert Reports	4/15/19	7/15/19
Exchange Rebuttal Expert Reports	4/29/19	7/29/19
Close of Expert Discovery	5/13/19	8/12/19
Disposition Motion Hearing	6/27/19	9/26/19
Pretrial Conference	9/24/19	11/26/19
Jury Trial (10 days)	10/7/19	12/09/19

IT IS SO STIPULATED.

Dated: March 1, 2019

Law Office of Kathleen E. Wells

By: \_\_\_\_\_/s/  
KATHLEEN E. WELLS, Attorney for  
Plaintiff Thomas Parrish

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By: /s/  
JEROME M. VARANINI  
Attorney for Defendant California Forensic  
Medical Group, Inc.

DANA McRAE, COUNTY COUNSEL

By: /s/  
 RYAN THOMPSON  
 Assistant County Counsel  
 Attorneys for Defendants County of Santa  
 Cruz and Officer David Ganschow  
 [erroneously sued as “OFFICER  
 GHANOW”]

1  
2 **~~[PROPOSED]~~ ORDER**


3 Good cause appearing and based on the stipulation of counsel, the Court makes the following  
4 Order:

5 The dates in the scheduling order are continued as follows:

6 <u><b>Event</b></u>	<u><b>Date</b></u>
7 Close of Fact Discovery	6/28/19
8 Exchange Opening Expert Reports	7/15/19
9 Exchange Rebuttal Expert Reports	7/29/19
10 Close of Expert Discovery	8/12/19
11 Disposition Motion Hearing	9/26/19 at 2:00 p.m.
12 Pretrial Conference	11/26/19 at 3:00 p.m.
13 Jury Trial (10 days)	12/09/19 at 8:30 a.m.

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19 **IT IS SO ORDERED.**

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22 DATED: 3/4/2019

  
THE HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT COURT JUDGE